

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

CONSERVATION LAW FOUNDATION, INC.,)
Plaintiff)
v.) Case No. 3:22-cv-01087
SCHNITZER PUERTO RICO, INC.,)
Defendant.)

)

JOINT NOTICE REGARDING ENTRY OF CONSENT DECREE

Plaintiff Conservation Law Foundation (“CLF” or “Plaintiff”) and Defendant Schnitzer Puerto Rico, Inc. (“SPR” or “Defendant”) (jointly “the Parties”) hereby provide notice that the United States Department of Justice reviewed the proposed consent judgment in this action and does not object to its entry by this Court. See Ex. 1 (Letter from U.S. Department of Justice) and its attached Exhibit A (Letter from Comité Diálogo Ambiental, Inc.). In addition, the 45-day review period ended on January 30th, 2023.

Accordingly, the Parties request that the Court enter the previously filed Consent Decree. ECF No. 20-1 (Consent Decree). The Consent Decree represents a settlement of all claims presented by Plaintiff against the Defendant in this case. The Parties represent that the settlement terms are appropriate, reasonable, and in the public interest.

January 31, 2023

Respectfully submitted,

CONSERVATION LAW FOUNDATION,
INC.

By its attorneys:

/s/ Miguel Sarriera-Román
Miguel Sarriera-Román, Esq.
USDC-PR 207714
Miguel Sarriera Román Law Office
1104 Calle San Miguel
Quebradillas, PR 00678-2803
Phone: (787) 630-8319
Email: miguelsarriera@yahoo.com

Heather A. Govern, Esq.
Pro hac vice motion to be filed
Conservation Law Foundation
62 Summer Street
Boston, MA 02110
(617) 850-1765
hgovern@clf.org

Chelsea E. Kendall, Esq.
Pro hac vice motion to be filed
Conservation Law Foundation, Inc.
62 Summer St.
Boston, MA 02110
(617) 850-1792
ckendall@clf.org

SCHNITZER PUERTO RICO, INC.

By its counsel:

McCONNELL VALDÉS LLC
270 Muñoz Rivera Avenue Hato
Rey, Puerto Rico 00918 PO Box
364225
San Juan, Puerto Rico 00936-4225
Tel: (787) 250-5669
Fax: (787) 759-8282

s/ Carlos J. Fernández-Lugo
Carlos J. Fernández-Lugo, Esq.
USDC-PR No. 210305
cfl@mcvpr.com

s/ Diego R. Meléndez-Apellániz
Diego R. Meléndez-Apellániz, Esq.
USDC-PR No. 305008

drma@mcvpr.com

Stoel Rives LLP
600 University Street, Suite 3600
Seattle, WA 98101
Tel: (206) 624-0900
Fax: (206) 386-7500

s/ Beth S. Ginsberg
Beth S. Ginsberg, Esq.
beth.ginsberg@stoel.com
Admitted Pro Hac Vice

s/ Veronica M. Keithley
Veronica M. Keithley, Esq.
veronica.keithley@stoel.com
Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2023, the foregoing joint motion was filed through the ECF system, by which means a copy of the filing will be sent electronically to all parties registered with the ECF system.

/s/ Miguel Sarriera-Román
Miguel Sarriera-Román